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Dear MLPA Science Advisory Team:

I genuinely appreciate all your hard work in the MLPA process to date. I have only been following it for a short period of time, but want to share with you a few observations about the models, and evaluation methodology.

I do understand the usefulness of models to simplify and clarify the issues, and I especially recognize the challenges of creating these when the data is so complex, diverse, and incomplete.

As you know, when scientific models are developed for a certain environment and then used in another, there needs to be a careful review of whether or not any new factors affect how the model performs in achieving the desired outcome, which in this case I assume is maximizing the net benefit to the marine life. It is often the case that the model needs to be adjusted to accommodate the new factors.

From listening to the last few MLPA meetings, it stands out that there are several areas and situations where the evaluation score produced by the model does not correlate to the net benefit to marine life. These are areas that I feel the SAT needs to give greater attention to.

Applying the model and evaluation system in the same way to areas that are highly impacted by human activity vs. areas that already have thriving marine life populations is one example of where the model breaks down. This one size fits all approach is especially problematic when it is applied to an area such as the proposed nearshore MPA at Saunders Reef, which has very light human usage because of the dangerous seas, high winds, lots of cliff frontage, and the remoteness to launch sites. (Anchor Bay to the south is not a heavily used access point due to the difficulty of dragging boats across more than 100 yards of sand and launching into the surf.) Therefore, placing an SMR or high SMCA in the nearshore Saunders Reef area would produce almost no net benefit to marine life, yet a restrictive MPA in this area would score very high on size, spacing, habitat representation, and overall marine life protection. Whereas instead applying a SMP or SMCA/ribbon approach, would produce a negligible difference in regards to the outcome for marine life, but would result in a very low scoring proposal.

This lack of correspondence between the scoring system and net increased benefit to marine life has the affect of favoring greater restrictions than are necessary in some areas and making certain outcomes inevitable which could cause unnecessary harm to local communities. Yet it doesn't seem to result in any real increased protection to the marine life other than creating the appearance of protection on a map.

Shore fishing is another example where the existing evaluation methodology is not flexible enough to correlate the scoring to the actual negative impact on marine life. Along a rural, mostly inaccessible coastline such as the proposed Saunders Reef or Richardson Ranch MPAs, shore fishing would have an infinitesimally small impact on marine life. However, if shore fishing is an allowable activity in an SMCA, the protection factor for the whole MPA is disproportionately penalized in relationship to the harm to marine life, which creates a huge disincentive for stakeholders to include this activity in their proposals, even though disallowing this activity undercuts the socio-economic well being of coastal communities.

Therefore, I would appeal to the SAT to consider introducing an adjusting factor into your protection scoring so that it more closely relates to the real net increased benefit for marine life. If the honest answer to the basic question of whether the fish are significantly better off inside than outside a highly protected zone is no, then the scoring methodology used to evaluate the proposals should reflect this fact and the zone should not be high scoring. In the same light, an SMCA that allows for shore fishing should not be low scoring if the fish are still significantly safer within than without, and if an SMP in certain circumstances would provide just as much real protection to marine life as an SMR than the scoring should reflect this too.

I believe that most participants would acknowledge that the underlying science has come a long way in a short time and the work to date is very commendable. It just seems that it still has a little further to go.

Thank you for all you are doing to protect our marine life,

Laurie Schuyler
Haven’s Neck Preserve

cc. Blue Ribbon Task Force
MLPA Stakeholders Committee